

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

## EPIC GAMES, INC.

Case No. 4:20-cv-05640-YGR-TSH

### Plaintiff, Counter-defendant

**[PROPOSED] ORDER RE: EPIC GAMES,  
INC.'S ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
SEALED PURSUANT TO CIVIL LOCAL  
RULE 79-5**

APPLE INC.,

The Honorable Thomas S. Hixson

### Defendant, Counterclaimant

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[PROPOSED] ORDER RE: ERIC GAMM

CASE NO. 4:20-CV-05640-VGB-TSH

1 Pursuant to Federal Rule of Civil Procedure 26(c) and Civil Local Rule 79-5, Epic Games, Inc.  
 2 has filed an Administrative Motion to Consider Whether Another Party's Material Should Be Sealed  
 3 Pursuant to Civil Local Rule 79-5 ("Epic's Motion"). Pursuant to Civil Local Rule 79-5, Apple filed a  
 4 statement in support of Epic's motion and a supporting declaration of Mark A. Perry.  
 5

6 Having considered the Motion, all associated statements, declarations, exhibits, and any  
 7 argument of counsel, and for good cause appearing:

8 **IT IS HEREBY ORDERED** that Apple's request, consistent with the designations in its  
 9 supporting statement and declaration, is **GRANTED**.

10 Accordingly,

11 (1) The public shall only have access to the versions of the documents sought to be sealed by the  
 12 Motion in which portions of the following sections have been redacted or withheld:  
 13

14 <b>Portion of Document</b> <b>Sought to be Sealed</b>	15 <b>Document Title</b>	16 <b>Reason to Seal</b>
17 Entirety of document	18 Exhibit A to Epic's Motion	19 Reflects non-public Apple business and legal strategy
20 Entirety of document	21 Exhibit B to Epic's Motion	22 Reflects non-public Apple business and legal strategy
23 Entirety of document	24 Exhibit C to Epic's Motion	25 Reflects non-public Apple business and legal strategy
26 Entirety of document	27 Exhibit D to Epic's Motion	28 Reflects non-public Apple business and legal strategy
29 Entirety of document	30 Exhibit E to Epic's Motion	31 Reflects non-public Apple business and legal strategy
32 Redacted word in first entry on "Privilege Logs: Employee Slack Channels"	33 Exhibit F to Epic's Motion	34 Reflects non-public Apple business strategy
35 Redacted word in first entry on "Privilege Logs: Message	36 Exhibit F to Epic's Motion	37 Reflects non-public Apple business strategy

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Portion of Document Sought to be Sealed	Document Title	Reason to Seal
	Board and Attachments”		
	Redacted word in first entry on “Privilege Logs: Press or Business Communications”	Exhibit F to Epic’s Motion	Reflects non-public Apple legal strategy
	Redacted words in fourth entry on “Privilege Logs: Press or Business Communications”	Exhibit F to Epic’s Motion	Reflects non-public Apple legal strategy
	Redacted email addresses in fifth entry on “Privilege Logs: Press or Business Communications”	Exhibit F to Epic’s Motion	Reflects personally identifiable information

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2025

The Honorable Thomas S. Hixson  
United States District Court Magistrate Judge